Sedgwick, Detert, Moran & Arnold LLP 125 Broad Street, 39th Floor New York, New York 10004 (212) 422-0202 (212) 422-0925 Attorneys for Defendants Private Healthcare Systems, Inc. s/h/a "PHCS Private Health Systems," and MultiPlan, Inc.

UNITED STATES DISTRICT COURT DISTRICT COURT OF NEW JERSEY

-----x MICHELE SANDER,

Plaintiff, Civil No.: 08-cv-1383 (PGS/ES)

-against-

HR TRUST SERVICES, LLC, HR, TRUST LLP, HRT SERVICES, II, LLP, HRT INSURANCE AGENCY, LLP, OUTSOURCING WORKS, LLP, 1099 GROUP BENEFITS, LLP, IBO MANAGED SERVICES, INC., ACEVEDO SPAIN HOLDING, INC., ACEVEDO SPAIN, LP, RONALD SPAIN a/k/a RON SPAIN, JANICE ACEVEDO, SUPERIEN HEALTH NETWORKS, INTERPLAN HEALTH GROUP, PHCS PRIVATE HEALTH SYSTEMS, MULTIPLAN, INC., LDI PHARMACY SERVICES, INTERGROUP SERVIES, INC., WEB-TPA, INC., SPECTERA, INC., AND UNITED HEATHCARE GROUP.

NOTICE OF MOTION TO DISMISS

DOCUMENT ELECTRONICALLY FILED

| Defendants |
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| <br>x      |

**PLEASE TAKE NOTICE** that, upon the Declaration of Marcy Feller, Esq. dated May 27, 2010 and the exhibits annexed thereto, and the Memorandum of Law in support, all simultaneously submitted herewith, defendants PRIVATE HEALTHCARE SYSTEMS, INC. s/h/a "PHCS

PRIVATE HEALTH SYSTEMS" ("PHCS") and MULTIPLAN, INC. ("Multiplan"), by their

attorneys, Sedgwick, Detert, Moran & Arnold LLP, will move this Court on June 21, 2010, at 9:00

a.m., or as soon thereafter as counsel may be heard, at the United States District Court, District of

New Jersey, 50 Walnut Street, Newark, New Jersey, for an Order pursuant to FED. R. CIV. P.

12(b)(6), dismissing each of Plaintiff's claims asserted against PHCS and MultiPlan for failure to state

a claim upon which relief may be granted, and for such other and further relief as this Court may

deem just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served by

June 7, 2010.

Dated: New York, New York

May 27, 2010

Respectfully Submitted,

MICHAEL H. BERNSTEIN pro hac vice

NORA COLEMAN

SEDGWICK, DETERT, MORAN & ARNOLD LLP

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